

1 Honorable Marc Barreca
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6 IN THE UNITED STATES BANKRUPTCY COURT FOR THE
7 WESTERN DISTRICT OF WASHINGTON AT SEATTLE

8 In re:) Chapter 7
9 TREND SOUND PROMOTER AMG CORP.,) Bankruptcy No. 14-13193
10 Debtor(s).)
11 BANKRUPTCY ESTATE OF TREND) Adversary No. 14-01248
12 SOUND PROMOTER AMG CORP.,)
by and through Nancy James, Bankruptcy)
Trustee,)
13 Plaintiff,)
14 v.)
15 VOLODIMYR PIGIDA and JANE DOE)
PIGIDA, husband and wife, and the marital)
community comprised thereof, individually)
and as trustee of the Lakeshore Enterprises)
Trust; and MARINA BONDARENKO and)
JOHN DOE BONDARENKO, wife and)
husband, and the marital community)
comprised thereof, individually and as trustee)
of the Lakeshore Enterprises Trust, and)
SOUND ST STUDIOS LLC, a Washington)
limited liability company,)
21 Defendants.)

) STIPULATION AMENDING
STIPULATION FOR
PROTECTIVE ORDER

22 COME NOW the plaintiff, the Bankruptcy Estate of Trend Sound Promoter AMG Corp., by
23 and through the duly appointed trustee, Nancy James, through special counsel, The Rigby Law Firm,
24 and James Rigby, and the defendants, through counsel, MDK Law, and James P. Ware, and file this
25 Stipulation Amending Stipulation for Protective Order.

**STIPULATION AMENDING STIPULATION
FOR PROTECTIVE ORDER**
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THE RIGBY LAW FIRM
600 Stewart Street, Suite 1908
Seattle, WA 98101
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1 On December 29, 2014, the parties filed a Stipulation for Protective Order (Docket No. 19).
2 An Agreed Order Approving Stipulation for Protective Order was entered by the court on January
3 5, 2015 (Docket No. 22).

4 The parties wish to amend paragraph 2 of the Stipulation for Protective Order as follows:
5 expanding the material included as confidential to include “personal identifiers on the website,
6 including but not limited to names, addresses, passwords, pass codes, tax numbers, account names
7 and account numbers.”

8 WHEREFORE, the parties pray for a Stipulated Order Amending Agreed Order Approving
9 Stipulated Protective Order reflecting amended paragraph two referenced above.

10 DATED this 6th day of March, 2015.

THE RIGBY LAW FIRM

/S/ *James Rigby*

James Rigby, WSBA #9658
Special Counsel for Trustee

15 DATED this 6th day of March, 2015.

MDK LAW

/S/ James P. Ware

James P. Ware, WSBA #36799
Attorneys for Defendants.

**STIPULATION AMENDING STIPULATION
FOR PROTECTIVE ORDER**

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